

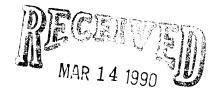
DEPARTMENT OF NATURAL RESOURCES DIVISION OF WILDLIFE RESOURCES

1596 West North Temple Salt Lake City, Utah 84116-3195 Division Director 801-533-9333

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March 7, 1990

Timothy H. Provan



DIVISION OF OIL, GAS & MINING

Dr. Dianne R. Nielsen, Director Utah Division of Oil, Gas & Mining 355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203

Subject: Utah Fuel Company/Skyline Mine Plan

Dear Dianne:

Utah Fuel Company's Skyline Mine Plan has been reviewed by the Division. Of primary concern is the future of the Questar gas pipeline #41 that traverses the mine permit area. Utah Fuel has sufficiently addressed measures to provide pillar support to the pipeline in order to negate the effects of subsidence. However, they have more recently stipulated that protection of the pipeline in its present location would result in the loss of 15 million tons of recoverable coal. Possible rerouting of the pipeline is now being considered by the U.S. Forest Service and an EIS is being written. If the Forest Service's decision is ultimately to reroute the pipeline, plans for such should be appended to the mine plan.

There are editorial corrections and additions concerning the wildlife in the mine area. Section 2.9.2 (Page 2-86A) discusses the moose population of the Wasatch Plateau. It should be included here that all of the riparian habitat at Skyline Mine provides winter habitat for moose.

In the species list (Table 2.9-3) one of the reptiles is listed as the Utah Mountain Ringsnake (Lampropeltis pyromelana). The correct common name for this species is the Utah Mountain Kingsnake and it is a high interest species, as is the Milk Snake. Table 2.9-2 should show the Tiger Salamander as high interest species as well.

All snake dens are protected and considered critical to survival of the specific populations. Although dens have not been located at the site, the mine plan should make note that future discoveries will be left undisturbed and reported to the Division.

The mine plan gives adequate reference to the existence of naturally reproducing cutthroat trout populations. Section 2.8 (Page 2-64, paragraph 3) still needs editing. The fish in Eccles Creek have access to the entire waterway, despite the presence of beaver dams above Whiskey Gulch.

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Section 2.3 (Page 2-23) discusses the seep and spring characteristics at the project area. Fault is found in the belief that due to the "short" travel distance between water supplies, should a frequently used spring dry up, the animals using said supply would not be greatly affected. All water sources in the area are important, not only for wildlife drinking needs, but for fishery and wetland existence. Due to small home range sizes, most wildlife cannot travel the distances between water sources. Mitigation for terrestrial wildlife can be in the form of guzzlers.

Although general migratory directions are mapped for big game (moose, deer and elk), it is not shown how the animals cross through the project area. This information is particularly important for their access past the proposed overland coal conveyor. Maps and plans for the conveyor still need to be included in the mine plan.

Thank you for an opportunity to review and provide comment.

Sincerely,

limothy H. Provan

Director